



**Air Quality  
TIER I OPERATING PERMIT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** T1-2008.0110

**FACILITY ID No.:** 065-00008

**AQCR:** 61

**CLASS:** A

**SIC:** 2034

**ZONE:** 12

**UTM COORDINATE (km):** 437.0, 4854

**1. PERMITTEE**

Basic American Foods, a Division of Basic American, Inc.

**2. PROJECT**

Tier I Operating Permit Modification

**3. MAILING ADDRESS**

40 East 7<sup>th</sup> North

**CITY**

Rexburg

**STATE**

ID

**ZIP**

83440

**4. FACILITY CONTACT**

Deloris Aguilar

**TITLE**

Environmental Superintendent

**TELEPHONE**

(208) 785-8306

**5. RESPONSIBLE OFFICIAL**

Joe Milligan

**TITLE**

Facility Manager

**TELEPHONE**

(208) 359-6820

**6. EXACT PLANT LOCATION**

40 East 7<sup>th</sup> North, Rexburg, Idaho

**COUNTY**

Madison

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Dehydrated Food Products and Animal Feed

**8. PERMIT AUTHORITY**

This Tier I operating permit is issued pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page.

**ZACH KLOTOVICH, PERMIT WRITER**

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER**

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:**

April 16, 2008

**DATE MODIFIED/AMENDED:**

XXXXX

**DATE EXPIRES:**

April 16, 2013

## Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE .....	3
1. TIER I OPERATING PERMIT SCOPE .....	4
2. FACILITY-WIDE CONDITIONS .....	6
3. KIPPER BOILER .....	13
4. BOILERS 1 AND 2 .....	22
5. PROCESS A .....	24
6. PROCESS B .....	27
7. SPACE HEATERS .....	30
8. CARBON MONOXIDE EMISSIONS LIMIT .....	31
9. NONAPPLICABLE REQUIREMENTS .....	33
10. INSIGNIFICANT ACTIVITIES .....	34
11. TIER I OPERATING PERMIT GENERAL PROVISIONS .....	36

## Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/yr	tons per year
µg/m <sup>3</sup>	micrograms per cubic meter
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

## 1. TIER I OPERATING PERMIT SCOPE

### *Purpose*

- 1.1 This Tier I operating permit incorporates the conditions of Tier II Operating Permit and Permit to Construct No. T2-2008.0109. Issuance of this modified Tier I operating permit fulfills the requirements of the compliance schedule contained in Tier I Operating Permit No. T1-060513.
- 1.2 The Tier I permit incorporates the following permits:
  - Tier II Operating Permit and Permit to Construct No. T2-2008.0109.
- 1.3 This Tier I renewal supersedes the following permit(s):
  - Tier I Operating Permit No. T1-060513, issued April 16, 2008.
  - Tier I Operating Permit No. T1-2008.0053, issued June 10, 2008.

# AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No. 065-00008</b>
<b>Location:</b>	Rexburg, Idaho	

## Regulated Sources

1.4 Table 1.1 lists all sources of emissions regulated in this Tier I operating permit.

**Table 1.1 REGULATED SOURCES**

Permit Section	Source Description	Emissions Control Equipment
3	<u>Kipper Boiler</u> Manufacturer: Kipper and Sons, Inc. Rated steam production: 65,000 lb/hr Fuels: Wood, coal	Zurn multiclone and Riley Ventri-Rod® scrubber
4	<u>Boiler 1</u> Manufacturer: Erie City Rated steam production: 40,000 lb/hr Fuel: natural gas	None
4	<u>Boiler 2</u> Manufacturer: Erie City Rated steam production: 26,500 lb/hr Fuel: natural gas	None
5	<u>Process A</u> – Dehydrated potato products 7020 (Cooler vent) 7101 (Dryer, 6.5 MMBtu/hr, natural gas-fired) 7102 (Dryer, 6.5 MMBtu/hr, natural gas-fired) 7019 (Dryer, 6.6 MMBtu/hr, steam and natural gas) 7001 (Dryer, steam-heated) 7027 (Cooler) Material Recovery Unit 7006	None
6	<u>Process B</u> – Dehydrated food products 5037 (Cooler/dryer vent, dryer is steam heated) 4000 (Dryer, steam heated) 228 (Dryer, natural gas-fired, 16.1 MMBtu/hr) 234 (Second exhaust from dryer 228) 410/411 (Dryer vent, steam-heated) 311, 312 (Dryer vent, steam-heated) 638 (Dryer vent, steam heated) 613/614 (Dryer vent, steam heated) 615/616 (Dryer vent, steam heated) 572 (Vent from material recovery cyclone in animal feed load-out system) Materiel Recovery Unit 5034 Materiel Recovery Unit 707 (fabric filter) Materiel Recovery Unit 725 (fabric filter) Materiel Recovery Unit 8 (fabric filter) Materiel Recovery Unit 5001 Materiel Recovery Unit 5000 (fabric filter) Materiel Recovery Unit 432 (fabric filter) Materiel Recovery Unit 322	None
7	Space Heaters	None

## AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No. 065-00008</b>
<b>Location:</b>	Rexburg, Idaho	

### 2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

**Table 2.1 APPLICABLE REQUIREMENTS SUMMARY**

Permit Condition	Parameter	Permit Limit/Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive Emissions	Reasonable Precautions	IDAPA 58.01.01.650-651.	2.2, 2.3, 2.4, 2.11
2.5	Odors	Emissions shall not cause air pollution	IDAPA 58.01.01.775-776	2.6, 2.11
2.7	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.11
2.9	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130	2.9-2.95, 2.11, 2.12
2.10	Performance Testing	Test in accordance with IDAPA 58.01.01.157	Test in accordance with IDAPA 58.01.01.157	2.10, 2.11
2.13	Open Burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-617	2.11
2.14	Renovation/Demolition	Asbestos removal	40 CFR 61, Subpart M	2.11, 2.14
2.15	Regulated Substances	Accidental Release Prevention	40 CFR 68	2.11, 2.15
2.16	Recycling and Emissions Reduction	Reduce emissions of Class I and Class II refrigerants	40 CFR 82, Subpart F	2.11, 2.16

#### ***Fugitive Dust***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.  
**[IDAPA 58.01.01.650-651, 5/1/94]**
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive dust emissions.  
**[IDAPA 58.01.01.322.06, 07, 5/1/94]**
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.  
**[IDAPA 58.01.01.322.06, 07, 5/1/94]**
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust emissions are not

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive dust emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

### **Odors**

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776(state-only), 5/1/94]

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

### **Visible Emissions**

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

## **Excess Emissions**

### *Excess Emissions - General*

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.
- 2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

### *Excess Emissions – Startup, Shutdown, Scheduled Maintenance*

- 2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:
- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.

[IDAPA 58.01.01.133, 4/5/00]

[IDAPA 58.01.01.133.01.a, 3/20/97]

- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

### *Excess Emissions – Upset, Breakdown, or Safety Measures*



<b>AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110</b>		
<b>Permittee:</b>	Basic American Foods	<b>Facility ID No. 065-00008</b>
<b>Location:</b>	Rexburg, Idaho	

- 2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

**[IDAPA 58.01.01.134, 4/5/00]**

- 2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

**[IDAPA 58.01.01.134.02, 4/5/00]**

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

**[IDAPA 58.01.01.134.02.a, 4/5/00]**

- The owner or operator shall notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

**[IDAPA 58.01.01.134.02.b, 4/5/00]**

- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

**[IDAPA 58.01.01.134.02.c, 3/20/97]**

- 2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

**[IDAPA 58.01.01.134.03 4/5/00]**

#### *Excess Emissions – Reporting and Recordkeeping*

- 2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

**[IDAPA 58.01.01.135.01 and 02, 3/20/97]**

- 2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

**[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]**

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.</b> 065-00008
<b>Location:</b>	Rexburg, Idaho	

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

### ***Performance Testing***

- 2.10 If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

The permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded or as otherwise specified in an approved emission testing protocol. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Idaho Falls Regional Office  
900 N. Skyline, Suite B  
Idaho Falls, ID 83402  
Phone: (208) 528-2650 Fax: (208) 528-2695

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

### ***Monitoring and Recordkeeping***

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

- 2.11 The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request. During periods when a process or activity is shut down or not operating, monitoring requirements for that process are suspended. In these circumstances, monitoring reports submitted shall note that the process was shut down or not operating, and shall provide, as applicable, the dates of shutdown and startup.

[IDAPA 58.01.01.322.07, 5/1/94]

### ***Reports and Certifications***

- 2.12 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Idaho Falls Regional Office  
900 N. Skyline, Suite B  
Idaho Falls, ID 83402  
Phone: (208) 528-2650 Fax: (208) 528-2695 Email: Rensay.Owen@deq.idaho.gov

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10  
Air Operating Permits, OAQ-107  
1200 Sixth Ave.  
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

### ***Open Burning***

- 2.13 The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-617.  
[IDAPA 58.01.01.600-617, 3/30/07]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

### ***Renovation/Demolition***

- 2.14 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

### ***Regulated Substances for Accidental Release Prevention***

- 2.15 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

### ***Recycling and Emissions Reductions***

- 2.16 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

### 3. KIPPER BOILER

#### *Summary Description*

The Kipper boiler is a wood and coal-fired boiler with an original steam production rating of 60,000 pounds per hour. The boiler can burn up to 39% coal on a fuel weight basis (i.e. 50% of the heating value). The Kipper boiler was installed in 1981, and an economizer was added in 2001, increasing the maximum steam production rate to 65,000 lb/hr. Emission controls on the Kipper boiler include a Zurn multiclone dust collector and a Riley Ventri-Rod® scrubber.

Table 3.1 describes the devices used to control emissions from the Kipper boiler.

**Table 3.1 EMISSIONS UNIT AND EMISSIONS CONTROL DEVICES**

Emissions Unit / Process	Emissions Control Device
Kipper boiler	Zurn multiclone and Riley Ventri-rod® scrubber

Table 3.2 contains only a summary of the requirements that apply to the Kipper boiler. Specific permit requirements are listed below Table 3.2.

**Table 3.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring and Recordkeeping Requirements
3.1	PM <sub>10</sub>	16.3 lb/hr (24-hr average) 71.2 tons per any consecutive 12 months	PTC Condition; IDAPA 58.01.01.203.01	3.5, 3.7-3.15, 3.17-3.19
3.2	SO <sub>2</sub> emissions limit	214 tons per any consecutive 12 months	PTC Condition; IDAPA 58.01.01.203.01	3.5, 3.6
3.3	Fuel burning equipment particulate matter standard	0.080 gr/dscf corrected to 8% oxygen when burning wood 0.050 gr/dscf corrected to 8% oxygen when burning coal	IDAPA 58.01.01.675 PTC Letter issued 7/30/80	3.4, 3.6-3.9
3.4	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8

#### ***Permit Limits / Standard Summary***

##### **3.1 PM<sub>10</sub> Emissions Limits**

Emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>) from the Kipper boiler stack shall not exceed 16.3 pounds per hour (24-hour average) and 71.2 tons per any consecutive 12-month period year.

**[PTC Condition; IDAPA 58.01.01.203.01, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]**

##### **3.2 SO<sub>2</sub> Emissions Limit**

Emissions of sulfur dioxide (SO<sub>2</sub>) from the Kipper boiler stack shall not exceed 214 tons per any consecutive 12-month period.

**[PTC Condition; IDAPA 58.01.01.203.01, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]**

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

### 3.3 Fuel Burning Equipment - PM

- 3.3.1 Particulate matter emissions from the Kipper boiler shall not exceed 0.080 gr/dscf corrected to 8% oxygen when burning wood fuel.
- 3.3.2 Particulate matter emissions from the Kipper boiler shall not exceed 0.050 gr/dscf corrected to 8% oxygen when burning coal.
- 3.3.3 When two or more types of fuel are burned concurrently, the allowable emissions shall be determined by proportioning the gross heat input and emissions standards for each fuel. The proportional heat input shall be determined in accordance with Permit Condition 3.11.  
[PTC Letter, 7/30/80; IDAPA 58.01.01.675, 4/5/00]

### 3.4 Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625.  
[IDAPA 58.01.01.625, 4/5/00; IDAPA 58.01.01.322.01, 3/19/99]

## ***Operating Requirements***

### 3.5 Kipper Boiler Fuel Types

The permittee may combust only wood or a wood-coal mixture in the Kipper boiler. The Kipper boiler may be fired using coal up to 50% of the heat input on a 24-hour average.  
[PTC Letter, 7/30/80 (amended 5/8/84); IDAPA 58.01.01.211.01, 5/1/94]

### 3.6 Coal Requirements

- 3.6.1 The sulfur content of the coal used in the Kipper boiler shall not exceed 1.0 % by weight.
- 3.6.2 The total quantity of coal combusted in the Kipper boiler shall not exceed 57 tons per day and 12,228 tons per any consecutive 12-month period.  
[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94; IDAPA 58.01.01.729, 5/1/94]

### 3.7 Steam Production

- 3.7.1 The Kipper boiler steam production rate shall not exceed 65,000 pounds of steam per hour on a 24-hour rolling average.  
[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

### 3.8 Ventri-Rod® Scrubber and Multiclone

The permittee shall install, maintain, and operate a multiclone and a wet scrubber on the Kipper boiler to control the emissions of PM and PM<sub>10</sub>.  
[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

### 3.9 Operations Manual – Fuel Monitoring

Prior to combusting coal in the Kipper boiler, the permittee shall have developed a fuel monitoring operations manual for measuring the total tons of coal fed to the boiler on a daily basis. At a minimum the manual shall include a description of the equipment and the procedures/methods that will be used to measure the amount of coal fed to the boiler. A copy of the initial fuel monitoring operations manual, and any subsequent revisions, shall be maintained onsite and a copy shall be submitted to DEQ.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

### 3.10 Boiler Annual Inspection and Maintenance

At least once per calendar year, the permittee shall inspect the internal workings of the Kipper boiler and perform any maintenance required to maintain efficient combustion. The permittee shall maintain records of the boiler maintenance conducted to comply with this Permit Condition. The records shall provide the date the inspection was conducted and a description of the maintenance performed on the boiler to maintain combustion efficiency.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

## ***Monitoring and Recordkeeping Requirements***

### 3.11 Steam and Coal Monitoring

- 3.11.1 The steam produced in the boiler shall be monitored and recorded at least once per hour in units of pounds of steam per hour and average pounds of steam per hour per rolling 24-hour period.
- 3.11.2 The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a daily basis in units of tons per day. The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a monthly basis in units of tons per month and tons per rolling 12-month period.
- 3.11.3 The amount of heat input from coal shall be determined by multiplying the weight of coal fed to the boiler by 19 MMBtu/ton (9500 Btu/lb).
- 3.11.4 The total amount of heat input to the Kipper boiler shall be determined by multiplying the hourly steam production rate (lbs steam per hour) by the steam heat content (1,000 Btu/lb) and the boiler efficiency (0.725) to determine the heat input required to produce that amount of steam.
- 3.11.5 The amount of heat input from wood shall be determined by subtracting the amount of heat input from coal (Btu/hr) from the total amount of heat input to the boiler (Btu/hr).

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

### 3.12 Fuel Receipts

For each shipment of coal received, the permittee shall obtain and maintain records of the following information that specifies the sulfur content by weight of the shipment received:

- Fuel receipts from the fuel supplier; or
- Representative samples and laboratory analysis documentation.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

### 3.13 40 CFR 64.6 – Approved CAM Monitoring

The permittee shall assure compliance with the permit limits and standards for the Kipper boiler by conducting the approved monitoring and recordkeeping in Table 3.3.

[40 CFR 64.6]



## AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No. 065-00008</b>
<b>Location:</b>	Rexburg, Idaho	

**Table 3.3 COMPLIANCE ASSURANCE MONITORING REQUIREMENTS FOR THE KIPPER BOILER**

	Indicator No.1	Indicator No.2	Indicator No.3	Indicator No.4	Indicator No. 5
<b>I. Indicator</b>	Boiler Steaming Rate	Multiclone pressure drop	Scrubber downstream static pressure	Scrubber water pressure	Combination of firebox static pressure and induced draft fan speed setting
<b>Measurement Approach</b>	The boiler steaming rate is measured using a pressure and temperature compensated orifice plate that is located in the steam header. Data acquisition system monitors pressure drop across the plate, steam temperature, and steam pressure and calculates steam rate from these parameters.	The multiclone pressure drop is measured by digital pressure gauges located upstream and downstream of the multiclones. Pressure drop is determined by the difference in reading between the gauges and is displayed in the boiler control room.	The scrubber downstream static pressure is measured using a digital pressure gauge in the scrubber throat downstream of the scrubber rods.	The scrubber water pressure is measured using a manual pressure gauge located in the scrubber water supply header. Scrubber water pressure is determined by direct observation of the gauge.	The firebox static pressure is measured using a digital pressure gauge tapped into the firebox. The induced draft fan speed setting is measured directly from the speed control setting for the fan.
<b>II. Indicator Range</b>	An excursion is defined as a boiler steaming rate less than 35,000 lbs/hr or greater than 65,000 lbs/hr.	An excursion is defined as a multiclone pressure drop less than 1.0 inches of water or greater than 6.0 inches of water.	An excursion is defined as a scrubber downstream static pressure that is less than 5.6 inches of water column.	An excursion is defined as a scrubber water pressure less than 4.0 psig or greater than 10 psig.	An excursion is defined as any time the induced draft fan goes to 100% speed and is unable to maintain a negative pressure in the firebox.
<b>III. Performance Criteria</b>					
<b>A. Data Representativeness</b>	The boiler steaming rate sensor is located in the steam header.	The multiclone pressure drop monitors are located upstream and downstream of the multiclones. The sensitivity is $\pm 0.1$ in. H <sub>2</sub> O.	The scrubber downstream static pressure monitor is located downstream of the scrubber rods. The sensitivity is $\pm 0.1$ in. H <sub>2</sub> O.	The scrubber water pressure monitor is located in the water supply header. The gauge can be read to $\pm 0.5$ psig.	The firebox static pressure monitor is tapped into the firebox. The sensitivity is 0.01 inches of water column. The fan speed is recorded directly from the boiler control system and is recorded to the nearest 0.1 %.
<b>B. Verification of Operational Status</b>	n/a	n/a	n/a	n/a	n/a
<b>C. QA/QC Practices and Criteria</b>	The steam recorder was calibrated when installed. The orifice plate will be inspected every other year for physical condition and Basic American Foods will check the overall health of the transmitter system by conducting span checks.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. <sup>2</sup> The performance of the transmitters will be checked every other year and will include conducting span checks of the entire loop.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. <sup>2</sup> The performance of the transmitter will be checked every other year and will include conducting span checks of the entire loop.	The pressure gauge reading will be compared with a second manual pressure gauge monthly. If readings differ by more than 1 psig, troubleshooting will be initiated.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. The performance of the transmitters will be checked every other year and will include conducting span checks of the entire loop. The induced draft fan speed setting does not require a calibration.

## AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No. 065-00008</b>
<b>Location:</b>	Rexburg, Idaho	

	Indicator No.1	Indicator No.2	Indicator No.3	Indicator No.4	Indicator No. 5
I. Indicator	Boiler Steaming Rate	Multiclone pressure drop	Scrubber downstream static pressure	Scrubber water pressure	Combination of firebox static pressure and induced draft fan speed setting
D. Monitoring Frequency	The boiler steam production is totaled continuously and recorded hourly.	Recorded every 2 hours.	Recorded every 2 hours.	Recorded every 2 hours.	Recorded every two hours.
Data Collection Procedures	Data acquisition system records hourly total.	Manually recorded in the boiler operating log.	Manually recorded in the boiler operating log.	Manually recorded in the boiler operating log.	Manually recorded in the boiler log.
Averaging period <sup>1</sup>	1-hour average steaming rate.	Not to be exceeded at any time	Not to be exceeded at any time	Not to be exceeded at any time	Not to be exceeded at any time.

<sup>1</sup> The operating parameters are not to be deviated from at any time under normal operation. Periods of startup and shutdown are excluded.

<sup>2</sup> The statement regarding stability of digital pressure monitors was provided by Basic American Foods in December 7, 2007, Compliance Assurance Monitoring Design letter.

**[proposed] [40 CFR 64.6]**

### **3.14      40 CFR 64.7 - Operation of Approved Monitoring**

(a) *Commencement of operation.* The owner or operator shall conduct the monitoring required under this part (i.e., 40 CFR 64) upon issuance of a part 70 or 71 permit (i.e., this Tier I OP renewal) that includes such monitoring.

(b) *Proper maintenance.* At all times, the owner or operator shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) *Continued operation.* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the Kipper Boiler is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(d) *Response to excursions or exceedances.* (1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

(2) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(e) *Documentation of need for improved monitoring.* After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit (i.e., Tier I OP) to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7]

### 3.15 **40 CFR 64.8 -Quality Improvement Plan (QIP) Requirements**

If it is determined that a Quality Improvement Plan is required based on a determination under §64.7(d)(2), the permittee shall comply with QIP requirements in accordance with 40 CFR 64.8.

[40 CFR 64.8]

## ***Performance Test Requirements***

### 3.16 **CO Performance Test**

Within 60 days of initially firing coal in the Kipper boiler as part of a wood-coal mixture, and at such other times as may be required by the Director, the permittee shall conduct a performance test to measure CO emissions from the Kipper boiler stack when firing a wood-coal mixture to demonstrate compliance with the CO emissions factor in Permit Condition 8.3. The test shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 10, or a DEQ-approved alternative. The initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- The measured CO emission rates shall be reported in units of pounds per hour. All calculations used to convert the test results into these units shall be provided in the test report; and
- The quantity of coal and the quantity of wood in the fuel mixture shall be reported by weight (in units of tons/hr) or by gross heat content (in units of MMBtu/hr and Btu/lb). The methods used to make these determinations shall be described.

[PTC Condition; IDAPA 58.01.01.211.04, 5/1/94; IDAPA 58.01.01.157, 4/5/00]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

### 3.17 PM Performance Tests

No later than September 6, 2011, the permittee shall conduct a performance test to measure PM and PM<sub>10</sub> emissions from the Kipper boiler stack to demonstrate compliance with the PM emissions standard in Permit Condition 3.3 and the PM<sub>10</sub> emissions limit in Permit Condition 3.1.

In addition, within 60 days of commencing the firing of coal as part of a wood-coal mixture, the permittee shall conduct a performance test to measure PM and PM<sub>10</sub> emissions from the Kipper boiler stack to demonstrate compliance with the PM emissions standard in Permit Condition 3.3 and the PM<sub>10</sub> emissions limit in Permit Condition 3.1.

The tests shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5 for PM emissions and Methods 5 and 202 for PM<sub>10</sub> emissions. The initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The boiler steaming rate;
- The static air pressure and water pressure at the wet Ventri-Rod® scrubber;
- The pressure drop across the multiclone;
- The quantity of coal and the quantity of wood in the fuel mixture shall be reported separately, either by weight (in units of tons/hr) or by gross heat content (in units of MMBtu/hr and Btu/lb). The methods used to make these determinations shall be described.

The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report. Visible emissions shall be observed and recorded using the methods specified in IDAPA 58.01.01.625. In addition to correcting the Method 5 test results to 8% oxygen, the Method 5 results shall be corrected for altitude as required by IDAPA 58.01.01.680 to demonstrate compliance with the fuel burning equipment particulate matter standard.

After the initial performance test, future testing shall be performed according to the following schedule. If the PM emission rate measured in the most recent test is less than or equal to 75% of the emission standard in Permit Condition 3.3, the next test shall be conducted within five years of the test date. If the PM emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 3.3, the next test shall be conducted within two years of the test date. If the PM emission rate measured during the most recent performance test is greater than 90% of the emission standard in Permit Condition 3.3, the next test shall be conducted within one year of the test date.

[PTC Condition; IDAPA 58.01.01.211.04, 5/1/94; IDAPA 58.01.01.157, 4/5/00]

## ***Reporting Requirements***

### 3.18 Coal Combustion

The permittee shall notify DEQ in writing of the following event within 5 working days after occurrence:

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

- Date of commencement of firing a wood-coal mixture in the Kipper boiler.  
[PTC Condition; IDAPA 58.01.01.211.03, 5/1/94]

### 3.19 **40 CFR 64.9 -Reporting and Recordkeeping Requirements**

(a) *General reporting requirements.* (1) On and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part (i.e., 40 CFR 64) the owner or operator shall submit monitoring reports to the permitting authority in accordance with 40 CFR 70.6(a)(3)(iii) (see General Provision 24).

(2) A report for monitoring under this part (i.e., 40 CFR 64) shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(iii) (Not applicable until a Quality Improvement Plan is required.)

(b) *General recordkeeping requirements.* (1) The owner or operator shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.</b> 065-00008
<b>Location:</b>	Rexburg, Idaho	

#### 4. BOILERS 1 AND 2

##### ***Summary Description***

Boilers 1 and 2 were manufactured by Erie City, are natural gas-fired, and have rated heat input capacities of 52 MMBtu/hr and 35 MMBtu/hr, respectively. Boilers 1 and 2 were installed prior to 1965.

Table 4.1 describes the devices used to control emissions from Boilers 1 and 2.

**Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emissions Unit(s) / Process(es)	Emissions Control Device
Boiler 1	None
Boiler 2	None

Table 4.2 contains only a summary of the requirements that apply to boilers no. 1 and no. 2. Specific permit requirements are listed below Table 4.2.

**Table 4.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
4.1	Particulate matter	0.015 gr/dscf corrected to 3% oxygen	IDAPA 58.01.01.675	4.3, 4.4
4.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.7, 2.8, 4.3, 4.4

##### ***Permit Limits / Standard Summary***

#### **4.1 Fuel Burning Equipment – PM**

Particulate matter emissions from Boiler 1 and Boiler 2 shall not exceed 0.015 gr/dscf corrected to 3% oxygen when burning natural gas.

**[IDAPA 58.01.01.675, 5/1/94]**

##### ***Operating Requirements***

#### **4.2 Boiler Annual Inspection and Maintenance**

At least once per calendar year or per a DEQ-approved schedule, the permittee shall tune and adjust the burner systems of Boilers 1 and 2 (Erie boilers) to maintain efficient combustion. The permittee shall maintain records of the boiler tuning conducted to comply with this Permit Condition. The records shall provide the date the tuning was conducted and a description of the adjustments made to the boiler to maintain combustion efficiency.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

#### **4.3 Fuel Requirements**

Boilers 1 and 2 shall be fired by natural gas exclusively.

**[IDAPA 58.01.01.322.01, 3/19/99]**

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

#### 4.4 Natural Gas Combustion Monitoring

The permittee shall install, calibrate, maintain, and operate equipment to measure the quantity of natural gas combusted. The natural gas combustion data is used in the facility-wide CO emission calculation in Section 8 of this permit. The following quantities of natural gas combusted shall be monitored and recorded on a monthly basis in units of million standard cubic feet (MMscf) per month and MMscf per rolling 12-month period:

- Total gas combusted at the Rexburg facility
- Total gas combusted by Boilers 1 and 2

The quantity of gas combusted per rolling 12-month period shall be determined by adding the quantity of gas combusted for the month plus the quantity of gas combusted during the previous consecutive 11-month period.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

## 5. PROCESS A

### Summary Description

The Basic American Foods Rexburg facility produces a variety of dehydrated food products for external customers and for internal use. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. Raw materials into the process are cooked potatoes, cooked foods, dehydrated foods, and additives, including sulfites. The processes addressed by this section are listed in Table 5.1 and include coolers, dryers, dehydration lines, and material transfer systems. Emissions of PM from each of these sources are uncontrolled. Material Recovery Units (MRUs), in the form of cyclones and fabric filters, are integral process equipment used to separate the pneumatically conveyed product from the air stream. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers. Process A was constructed in the early 1960s.

Table 5.1 describes the devices used to control emissions from Process A.

**Table 5.1 PROCESS A EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emissions Unit / Process	Emissions Control Device
Cooler/Dryer 7020 (Cooler vent)	None
Cooler/Dryer 7101 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None
Cooler/Dryer 7102 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None
Cooler/Dryer 7019 (Dryer, 6.6 MMBtu/hr, steam and natural gas)	None
Cooler/Dryer 7001 (Dryer, steam-heated)	None
Cooler/Dryer 7027 (Cooler)	None
Material Recovery Unit 7006	None

Table 5.2 contains only a summary of the requirements that apply to the emissions units in Process A. Specific permit requirements are listed below Table 5.2.

**Table 5.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring and Recordkeeping Requirements
5.1	PM <sub>10</sub>	PM <sub>10</sub> emissions shall not exceed the limits in Table 6.3	PTC Condition; IDAPA 58.01.01.203.02	5.3, 5.4, 5.5, 5.6, 5.7, 5.8
5.2	Particulate matter	Process weight rule	IDAPA 58.01.01.702	5.6

### Permit Limits / Standard Summary

#### 5.1 PM<sub>10</sub> Emission Limits

Emissions of PM<sub>10</sub> from the drying process and material transfer system stacks shall not exceed any corresponding emissions rate limits listed in the following table.



**AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110****Permittee:** Basic American Foods**Location:** Rexburg, Idaho**Facility ID No.** 065-00008**Table 5.3 DRYER PROCESS AND MATERIAL TRANSFER SYSTEM PM<sub>10</sub> EMISSIONS LIMITS<sup>a</sup>**

Source Description	PM <sub>10</sub> Emissions Limits (24-hr average)
Cooler/Dryer stack 7101	2.2 lb/hr
Cooler/Dryer stack 7102	2.2 lb/hr
Cooler/Dryer stack 7019	3.4 lb/hr

**[PTC Condition; IDAPA 58.01.01.203.02, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]****5.2 Process Weight Rate**

Process A shall not emit to the atmosphere PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 17,000 pounds per hour,  
 $E = 0.045 (PW)^{0.60}$
- b. If PW is equal to or greater than 17,000 pounds per hour,  
 $E = 1.12 (PW)^{0.27}$ .

**[IDAPA 58.01.01.702, 4/5/00]*****Operating Requirements*****5.3 Throughput Limits**

The production of dried products, including additives, from Process A shall not exceed 61 tons per 24-hour work day.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]****5.4 Dryer Fuels**

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]****5.5 Process Identification**

Process line A shall be identified by one or more signs posted on or near the process line. Each cooler or dryer shall also be identified in a manner that will allow an inspector to identify the equipment that corresponds to the equipment listed in Table 5.1.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]*****Monitoring and Recordkeeping Requirements*****5.6 Throughput Monitoring**

The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products including additives, in tons per day, from Process A.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

### 5.7 PM<sub>10</sub> Performance Test for Cooler/Dryer 7101 or 7102

Within 180 days of June 10, 2008, the permittee shall conduct a performance test to measure PM<sub>10</sub> emissions, in pounds per hour, from the stack of Cooler/Dryer 7101 or 7102 to demonstrate compliance with Permit Condition 5.2. The test shall be conducted in accordance with the procedures outlined in EPA Methods 5 and 202, or Methods 201a and 202. This performance test, and any subsequent tests, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The Cooler/Dryer shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625;
- The process output from the Cooler/Dryer shall be recorded in pounds per hour; and
- The burner firing rate of the Cooler/Dryer shall be recorded in MMBtu/hr.  
[proposed][PTC Condition; IDAPA 58.01.01.211.04, 5/1/94; IDAPA 58.01.01.157, 4/5/00]

### 5.8 PM<sub>10</sub> Performance Test for Cooler/Dryer 7019

Within 180 days of June 10, 2008, the permittee shall conduct a performance test to measure PM<sub>10</sub> emissions, in pounds per hour, from the stack of Cooler/Dryer 7019 to demonstrate compliance with Permit Condition 5.2. The test shall be conducted in accordance with the procedures outlined in EPA Methods 5 and 202, or Methods 201a and 202. This performance test, and any subsequent tests, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The Cooler/Dryer shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625;
- The process output from the Cooler/Dryer shall be recorded in pounds per hour; and
- The burner firing rate of the Cooler/Dryer shall be recorded in MMBtu/hr or scf/hr.  
[proposed][PTC Condition; IDAPA 58.01.01.211.04, 5/1/94; IDAPA 58.01.01.157, 4/5/00]

## AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No. 065-00008</b>
<b>Location:</b>	Rexburg, Idaho	

### 6. PROCESS B

#### *Summary Description*

The Basic American Foods Rexburg facility produces a variety of dehydrated food products for external customers and for internal use. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. Raw materials into the process are cooked potatoes, cooked foods, dehydrated foods, and additives, including sulfites. The processes addressed by this section are listed in Table 6.1 and include coolers, dryers, dehydration lines, and material transfer systems. Emissions of PM from each of these sources are uncontrolled. Material Recovery Units (MRUs), in the form of cyclones and fabric filters, are integral process equipment used to separate the pneumatically conveyed product from the air stream. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

Table 6.1 describes the devices used to control emissions from Process B.

**Table 6.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emissions Unit / Process	Emissions Control Device
Material Recovery Unit 5034	None
Cooler/Dryer 5037 (Cooler/dryer vent, dryer is steam heated)	None
Cooler/Dryer 4000 (Dryer, steam heated)	None
Cooler/Dryer 234/228 (Dryer, natural gas-fired, 16.1 MMBtu/hr)	None
Cooler/Dryer 410/411 (Dryer vent, steam-heated)	None
Cooler/Dryer 311, 312 (Dryer vent, steam-heated)	None
Cooler/Dryer 638 (Dryer vent, steam-heated)	None
Cooler/Dryer 613/614 (Dryer vent, steam heated)	None
Cooler/Dryer 615/616 (Dryer vent, steam heated)	None
Material Recovery Unit 707 (fabric filter)	None
Material Recovery Unit 725 (fabric filter)	None
Material Recovery Unit 8 (fabric filter)	None
Material Recovery Unit 5001	None
Material Recovery Unit 5000 (fabric filter)	None
Material Recovery Unit 432 (fabric filter)	None
Material Recovery Unit 322	None
Material Recovery Unit 572 (Vent from material recovery cyclone in animal feed load-out system)	None

Table 6.2 contains only a summary of the requirements that apply to the emissions units in Process B. Specific permit requirements are listed below Table 6.2.

**Table 6.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
6.1	PM <sub>10</sub>	PM <sub>10</sub> emissions shall not exceed the limits in Table 6.3	PTC Condition; IDAPA 58.01.01.203.02	6.3, 6.4, 6.5, 6.6, 6.7
6.2	Particulate matter	Process weight rule	IDAPA 58.01.01.702	6.6

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

## ***Permit Limits / Standard Summary***

### **6.1 PM<sub>10</sub> Emission Limits**

Emissions of PM<sub>10</sub> from the drying process and material transfer system stacks shall not exceed any corresponding emissions rate limits listed in the following table.

**Table 6.3 DRYER PROCESS AND MATERIAL TRANSFER SYSTEM PM<sub>10</sub> EMISSIONS LIMITS<sup>a</sup>**

Source Description	PM <sub>10</sub> Emissions Limits (24-hr average)
For each of the following Cooler/Dryer 3-stack groups, the arithmetic average of the emission rates from the combined 3 stacks in the group shall not exceed the listed emission limit:	
Stack group 4000, 228, and 234	3.2 lb/hr
Stack group 311, 312, and 410/411	1.2 lb/hr
Stack group 613/614, 615/616, and 638	2.2 lb/hr

[PTC Condition; IDAPA 58.01.01.203.02, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]

### **6.2 Process Weight Limit**

Process B shall not emit to the atmosphere PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- If PW is less than 9,250 pounds per hour,  
 $E = 0.045 (PW)^{0.60}$
- If PW is equal to or greater than 9,250 pounds per hour,  
 $E = 1.10 (PW)^{0.25}$ .

[IDAPA 58.01.01.702, 4/5/00]

## ***Operating Requirements***

### **6.3 Throughput Limits**

The production of dried products, including additives, from Process B shall not exceed 304 tons per 24-hour work day.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

### **6.4 Dryer Fuels**

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

## 6.5 Process Identification

Process line B shall be identified by one or more signs posted on or near the process line. Each cooler or dryer shall also be identified in a manner that will allow an inspector to identify the equipment that corresponds to the equipment listed in Table 6.1.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

## ***Monitoring and Recordkeeping Requirements***

### 6.6 Throughput Monitoring

The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products including additives, in tons per day, from Process B.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

### 6.7 PM<sub>10</sub> Performance Test for Cooler/Dryer: 228, 234, 311; 312, 4000, 410/411; 613/614, 615/616, 638

Within 180 days of June 10, 2008, the permittee shall conduct performance tests to measure the PM<sub>10</sub> emission rates, in pounds per hour, from the stacks of one of the following 3-stack groups to demonstrate compliance with Permit Condition 4.2: 4000, 228, and 234; 311, 312, and 410/411; or 613/614, 615/616, and 638. For purposes of demonstrating compliance with Permit Condition 6.1, the arithmetic average of the emission rates from the combined 3 stacks in the 3-stack group tested shall not exceed the corresponding emissions limit in Table 6.3, based on the average of three test runs. The test shall be conducted in accordance with the procedures outlined in EPA Methods 5 and 202, or Methods 201a and 202. This performance test, and any subsequent tests, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The Cooler/Dryer shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625;
- The process output from the Cooler/Dryer shall be recorded in pounds per hour; and
- If the Cooler/Dryer has a burner, the natural gas firing rate shall be recorded in MMBtu/hr or scf/hr.

[proposed][PTC Condition; IDAPA 58.01.01.211.04, 5/1/94; IDAPA 58.01.01.157, 4/5/00]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.</b> 065-00008
<b>Location:</b>	Rexburg, Idaho	

## 7. SPACE HEATERS

### *Summary Description*

There are currently 18 individual space heaters at the Rexburg facility in sizes ranging from less than 0.1 MMBtu/hr to 8.8 MMBtu/hr with a total combustion capacity of approximately 31 MMBtu/hr. Most of the space heaters are insignificant based on size. In accordance with IDAPA 58.01.01.317.01.b.i.(18), space heaters using natural gas, propane, or kerosene and generating less than 5 MMBtu/hr are insignificant activities. Currently there are two space heaters that exceed the insignificant activity criteria as listed in Table 7.1. Both of these space heaters are direct-fired heating units.

Table 7.1 describes the devices used to control emissions from plant space heaters.

**Table 7.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emissions Unit / Process	Emissions Control Device
REYCO shop roof heater (8.8 MMBtu/hr natural gas)	None
REYCO proctor roof heater (8.8 MMBtu/hr natural gas)	None

Table 7.2 contains only a summary of the requirements that apply to the space heaters. Specific permit requirements are listed below Table 7.2.

**Table 7.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
7.1	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 7.2

### *Permit Limits / Standard Summary*

- 7.1 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625.  
[IDAPA 58.01.01.625, 4/5/00]
- 7.2 The permittee shall assure compliance with Permit Condition 7.1 by conducting the visible emissions monitoring and recording identified in Permit Condition 2.8.  
[IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

**8. CARBON MONOXIDE EMISSIONS LIMIT**

**8.1 Carbon Monoxide Emissions Limit**

- 8.1.1 The CO emissions from the BAF facility shall not exceed 249 tons per year from aggregated emissions sources.  
[PTC Condition; IDAPA 58.01.01.203.01, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]

***Monitoring and Recordkeeping Requirements***

**8.2 Carbon Monoxide Emissions Limit Compliance**

- 8.2.1 For all combustion sources, BAF shall calculate and record rolling 12-month total CO emissions based on steam production and coal consumption for the boilers and natural gas consumption for the process dryers and space heaters. The CO compliance demonstration shall use emission factors developed through performance testing for the Kipper boiler and process dryers. BAF shall use AP-42 emissions factors for natural gas combustion to determine CO emissions for Boiler 1 and Boiler 2. Gas combusted in the plant space heaters shall be included with the process gas usage. Monthly calculations of actual emissions shall be used to determine rolling 12-month total emissions to demonstrate compliance with the annual emission limit in Permit Condition 8.1. Records shall be maintained onsite for a period of at least five years and shall be made available to DEQ representatives upon request.  
[proposed][PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

**8.3 CO Emissions**

The permittee shall monitor and record on a monthly basis the CO emission rate from the BAF Rexburg facility in tons per rolling 12-month period. The quantity of CO emissions shall be determined using the following equation:

$$E_{CO} = EF_{KB} * B_{SP} + [EF_P * (G_T - G_B)] + (EF_B * G_B)$$

- Where:  $E_{CO}$  = Facility CO emission rate in tons for the consecutive 12-month period  
 $EF_{KB}$  = Emission factor for Kipper boiler CO. The permittee shall use 0.464 tons CO/million pounds of steam, or a DEQ-approved alternative factor approved in writing.  
 $B_{SP}$  = Kipper boiler steam production in millions of pounds. Example - for 5,587,000 pounds of steam production in a rolling 12-month period, use 5.587.  
 $EF_P$  = Emission factor for natural gas used in the process. That is, CO emission factor for all natural gas combustion units at the facility except the boilers. The permittee shall use 0.133 ton/MMscf of natural gas, or a DEQ-approved alternative factor approved in writing.  
 $G_T$  = Total natural gas combusted at the Rexburg facility in the last 12-months; MMscf  
 $G_B$  = Total natural gas combusted in the Boilers 1 and 2 in the last 12 months; MMscf

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

$EF_B$  = Emission factor for natural gas used in Boilers 1 and 2. The permittee shall use 0.042 ton/MMscf, or a DEQ-approved alternative factor approved in writing.

After performance testing for CO emissions is conducted with coal firing per Permit Condition 3.16, the Permittee shall revise this equation to include a term for CO emissions during coal combustion. The revised equation shall be submitted to DEQ for review and approval prior to being used to calculate CO emissions.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

## ***Reporting Requirements***

### **8.4      Reporting**

- 8.4.1      Once per annum, BAF shall report to DEQ the rolling 12-month total CO emissions recorded under Permit Conditions 8.2 and 8.3. The report shall be for the period January 1<sup>st</sup> through December 31<sup>st</sup> and shall be due on or before March 1<sup>st</sup> of each calendar year. All reports must be certified in accordance with IDAPA 58.01.01.123.

[proposed][PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]



## AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No. 065-00008</b>
<b>Location:</b>	Rexburg, Idaho	

### 9. NONAPPLICABLE REQUIREMENTS

State and federal air quality requirements (e.g., rules and regulations) currently determined not applicable to the permittee are listed below along with the reason for the non-applicability:

**[IDAPA 58.01.01.325.01(b)]**

**Table 8.1 STATE AND FEDERAL AIR QUALITY REQUIREMENTS  
CURRENTLY DETERMINED NOT APPLICABLE TO THE PERMITTEE**

<u>Requirement</u>	<u>Reason Code</u>
<b>IDAPA Chapter 58.01.01:</b>	
Section 214 Preconstruction Requirements for Major HAP Sources	b
Section 336 Tier I Permits for Portable Sources	b
Section 500 Registration for Portable Equipment	b
Section 563-574 Transportation Conformity	b
Section 580 Classification of PSD Areas	i
Section 582 Conformity for Northern Ada County PM-10 Maintenance Area	d
Section 610-613 Industrial Flares, Residential Waste Fires, Landfill Site Fires, Orchard Fires	b
Section 626 Visible Emissions from Wigwam Burners	b
Section 776.02 Odors from Rendering Plants	b
Section 750-751 Control of Fluoride Emissions	a
Section 790-999 Rules for Specific Source Categories	b
<b>40 CFR</b>	
Part 49 Tribal Clean Air Authority	c
Part 51 Sections 51.1-51.45	i
Part 55 OCS Air Regulations	b
Part 56 Regional Consistency	i
Part 57 Nonferrous Smelter Rules	b
Part 59 VOC Standards for Consumer and Commercial Products	b
Part 60, except subparts A, Dc, and appendixes	b
Part 61, except subpart A, M, and appendixes	b
Part 62 Approval and Promulgation of State Plans for Designated Facilities and Pollutants	b
Part 63 National Emission Standards for Hazardous Air Pollutants	j
Part 71 through 80	b
Part 82, except subpart F	b
Parts 85 through 94	b

#### **Reason code definitions:**

- a this pollutant is not emitted by the facility
- b the facility is not currently in this source category
- c the facility is not in a special control/nonattainment area
- d the facility is not in this county
- e the facility does not have this emissions unit
- f the facility does not use this fuel type
- h this method/procedure is not used by the facility
- i this rule applies only to DEQ and regional authorities
- j the facility is not a major source of HAP emissions

# AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No. 065-00008</b>
<b>Location:</b>	Rexburg, Idaho	

## 10. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

**Table 10.1 INSIGNIFICANT ACTIVITIES**

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
Operation, loading, and unloading of storage tanks and storage vessels, with lids or other appropriate closures and less than 260-gallon capacity, heated only to the minimum extent necessary to avoid solidification.	IDAPA 58.01.01.317.01.B(1)
Operation, loading and unloading of storage tanks not greater than 1,100-gallon capacity with lids, not containing hazardous air pollutants and with maximum vapor pressure of 550 mmHg.	IDAPA 58.01.01.317.01.B(2)
Operation, loading and unloading of volatile organic compound storage tanks, 10,000-gallon capacity or less, with lids or other appropriate closure and vapor pressure not greater than 80 mmHg at 21°C.	IDAPA 58.01.01.317.01.B(3)
Operation, loading, unloading, and storage of butane, propane, or liquefied petroleum gas (LPG) in storage tanks or vessels less than 40,000-gallon capacity.	IDAPA 58.01.01.317.01.B(4)
Combustion sources, less than 5 MMBtu/hr, exclusively using natural gas, butane, propane, and/or LPG.	IDAPA 58.01.01.317.01.B(5)
Combustion source, not greater than 0.5 MMBtu/hr, if burning waste wood, wood waste, or waste paper.	IDAPA 58.01.01.317.01.B(8)
Welding using not more than 1 T/day of welding rod.	IDAPA 58.01.01.317.01.B(9)
"Parylene" coaters using less than 500 gallons of coating per year.	IDAPA 58.01.01.317.01.B(11)
Printing and silk-screening, using less than 2 gal/day of a combination of inks, coatings, adhesives, fountain solutions, thinners, retarders, or nonaqueous cleaning solutions.	IDAPA 58.01.01.317.01.B(12)
Water cooling towers, not using chromium-based corrosion inhibitors, not using barometric jets or condensers, not greater than 10,000 gal/min, and not in direct contact with gaseous or liquid process streams containing regulated air pollutants.	IDAPA 58.01.01.317.01.B(13)
Industrial water chlorination, less than 20 million gal/day capacity.	IDAPA 58.01.01.317.01.B(16)
Surface coating, using less than 2 gal/day.	IDAPA 58.01.01.317.01.B(17)
Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than 5 MMBtu/hr.	IDAPA 58.01.01.317.01.B(18)
Tanks, vessels, and pumping equipment, with lids or other appropriate closure, for storage or dispensing of aqueous solutions of inorganic salts, bases and acids, excluding solutions with: 99% or greater sulfuric or phosphoric acid; 77% or greater nitric acid; 30% or greater hydrochloric acid; or more than one liquid phase where the top phase is more than 1% VOC.	IDAPA 58.01.01.317.01.B(19)
Equipment, with lids or other appropriate closure, used exclusively to pump, load, unload, or store high-boiling-point organic material, with initial boiling point not less than 150°C or vapor pressure not more than 5	IDAPA 58.01.01.317.01.B(20)

# AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No. 065-00008</b>
<b>Location:</b>	Rexburg, Idaho	

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
mmHg at 21°C.	
Milling and grinding activities (paste forms, if used, are less than 1% volatile organic compounds).	IDAPA 58.01.01.317.01.B(22)
Rolling, forging, drawing, stamping, shearing, and spinning metals.	IDAPA 58.01.01.317.01.B(23)
Dip-coating operations using materials with less than 1% VOC.	IDAPA 58.01.01.317.01.B(24)
Surface coating, aqueous solution or suspension containing less than 1% VOC.	IDAPA 58.01.01.317.01.B(25)
Cleaning and stripping activities and equipment, using solutions having less than 1% volatile organic compounds by weight (no acid cleaning or stripping on metal substrates).	IDAPA 58.01.01.317.01.B(26)
Storage and handling of water based lubricants for metal working with organic content less than 10%.	IDAPA 58.01.01.317.01.B(27)
Process A, stack id. 7006 (material recovery unit)	IDAPA 58.01.01.317.01.B(27)
Process A, stack id. 7001 (cooler/dryer)	IDAPA 58.01.01.317.01.b.i.(30)
Process A, stack id. 7027 (cooler/dryer)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 5034 (material recovery unit)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 707 (material recovery unit)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 234 (dryer vent)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 311/312 (dryer vent)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 638	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 725 (material recovery unit)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 8 (material recovery unit)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 5001 (material recovery unit)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 5000 (tank vent)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 432 (material recovery unit)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 322 (material recovery unit)	IDAPA 58.01.01.317.01.b.i.(30)
Process B, stack id. 572 (material recovery unit)	IDAPA 58.01.01.317.01.b.i.(30)

- 10.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

## 11. TIER I OPERATING PERMIT GENERAL PROVISIONS

### **General Compliance**

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.  
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.  
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.  
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

### **Reopening**

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.  
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

### **Property Rights**

6. This permit does not convey any property rights of any sort, or any exclusive privilege.  
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

### **Information Requests**

7. The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.  
[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

8. Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.  
**[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]**

### ***Severability***

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.  
**[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]**

### ***Changes Requiring Permit Revision or Notice***

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.  
**[IDAPA 58.01.01.200-223, 4/6/05; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]**
11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.  
**[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/5/00; 40 CFR 70.4(b)(14) and (15)]**

### ***Federal and State Enforceability***

12. Unless specifically identified as a “State-only” provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source’s potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.  
**[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]**
13. Provisions specifically identified as a “State-only” provision are enforceable only in accordance with state law. “State-only” provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.  
**[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]**

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

### ***Inspection and Entry***

14. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

### ***New Requirements During Permit Term***

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/6/05; IDAPA 58.01.01.314.10.a.ii, 5/1/94;  
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

### ***Fees***

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387-397, 3/21/07; 40 CFR 70.6(a)(7)]

### ***Certification***

17. All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

### ***Renewal***

18. a. The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.  
[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

### ***Permit Shield***

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
    - i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
  - b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
  - c. Nothing in this permit shall alter or affect the following:
    - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
    - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
    - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
    - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;  
IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;  
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

### ***Compliance Schedule and Progress Reports***

- 20.
- a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
  - b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
  - c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.  
**[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]**

### ***Periodic Compliance Certification***

21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
- a. The compliance certifications for all emissions units shall be submitted annually for the period from January 1<sup>st</sup> to December 31<sup>st</sup> or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
  - b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
  - c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
    - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
    - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
    - iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
    - iv. Such information as the Department may require to determine the compliance status of the emissions unit.
  - d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.  
**[proposed][IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]**



AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2008.0110		
Permittee:	Basic American Foods	Facility ID No. 065-00008
Location:	Rexburg, Idaho	

### ***False Statements***

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.125, 3/23/98]

### ***No Tampering***

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.126, 3/23/98]

### ***Semiannual Monitoring Reports***

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1<sup>st</sup> to June 30<sup>th</sup> and from July 1<sup>st</sup> to December 31<sup>st</sup>. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.  
[proposed][IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

### ***Reporting Deviations and Excess Emissions***

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.  
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

### ***Permit Revision Not Required***

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.  
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

### ***Emergency***

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.  
[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]